

COLE, RAYWID & BRAVERMAN, L.L.P.

ATTORNEYS AT LAW

1919 PENNSYLVANIA AVENUE, N.W., SUITE 200

WASHINGTON, D.C. 20006-3458

TELEPHONE (202) 659-9750

FAX (202) 452-0067

WWW.CRBLAW.COM

THERESA Z. CAVANAUGH

DIRECT DIAL

202-828-9857

TZCAVANAUGH@CRBLAW.COM

LOS ANGELES OFFICE

2381 ROSECRANS AVENUE, SUITE 110

EL SEGUNDO, CALIFORNIA 90245-4290

TELEPHONE (310) 643-7999

FAX (310) 643-7997

December 31, 2001

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: CC Docket No. 94-102;
Third Quarterly Report of Northcoast Communications, LLC**

Dear Ms. Salas:

On behalf of Northcoast Communications, LLC ("Northcoast"), I am submitting this quarterly progress report on implementation of TTY access to Northcoast's digital wireless system. While Northcoast holds D, E and F block broadband PCS licenses to serve 56 markets, Northcoast presently is providing service in the Cleveland market only.

Northcoast utilizes Lucent Technologies ("Lucent") infrastructure equipment in its Cleveland market. As a result, Northcoast depends on the implementation of TTY solutions by Lucent. Once Lucent's TTY solution is commercially available, Northcoast will implement it in its Cleveland market. Northcoast understands that Lucent will be filing TTY capability status reports through the TTY Forum, and it directs the Commission to those reports for specific information regarding development and deployment activities. Northcoast will make every effort to implement TTY access in its markets by the June 30, 2002 deadline.

Northcoast also notes that its vendor, Lucent, has not yet made its digital TTY solution available to carriers. Therefore, Northcoast will not meet the December 31, 2001 deadline established by the Commission in the *Fourth Report and Order*¹ for obtaining all software upgrades and equipment necessary to make its system capable of transmitting 911 calls from TTY devices. Consequently, while it is not clear that a waiver is required, Northcoast

¹ Although the Commission's *Fourth Report and Order* contains the December 31, 2001 deadline, Section 20.18 of the rules does not provide for any such requirement.

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respectfully requests a waiver of this requirement, to the extent the Commission deems it necessary.

Please contact me if you require any additional information.

Sincerely,

Theresa Z. Cavanaugh

Cc: Steve Curtin
Kris Monteith, Chief, Policy Division – **Room 3B-103**
Pam Gregory, Chief, Disabilities Rights Office, CIB
Qualex International – Portals II – **Room CY-B402**